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April 14, 2016

Mr. Daniel Petales, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

OFFICE OF GENERAL
COUNSEL

MUR # 7044

Re:

Formal Complaint Against Jodey Cook Arrington, Candidate for U.S. House of Representatives, Texas,
District 19 (C00588657)

Dear Mr. Petalas:

I am writing to complain of Jodey Cook Arrington. Mr. Arrington states on his Financial Disclosure Report that he serves as president of Scott Laboratories, Inc., a Texas corporation, from which he received a salary of \$183,330 for the current year to filing of the form on February 6, 2016 (See report filed with the Clerk of the U.S. House at http://clerk.house.gov/public_disc/financial-pdfs/2015/10009542.pdf). His LinkedIn profile (<https://www.linkedin.com/in/jodeyarrington>) and his campaign profile (<http://www.jodeyarrington.com/about-jodey>) both state that he serves as president of Scott Laboratories, Inc. The amount of the salary logically leads to the presumed conclusion that Mr. Arrington is being paid for full time work by Scott Laboratories, Inc. Yet, Mr. Arrington has apparently been campaigning full-time since he announced his candidacy on October 15, 2015. (<http://www.everythinglubbock.com/news/local-news/arrington-announces-bid-for-congress>). For example, in a recent news article about Arrington's time on the campaign, Arrington notes that he took a week in Abilene to campaign for the Republican runoff election for Texas Congressional District 19 to be held on May 24, 2016. ("Arrington's Life on the Road as He Readies for Runoff," http://m.mypainview.com/news/article_4f95d0cc-eaba-11e5-a129-9b7289ccb332.html?mode=jqm). Mr. Arrington joined Scott Laboratories, Inc. on July 3, 2014, and he is no doubt a salaried employee, so it would appear unlikely at best that he could have accrued bona fide comp time for months of campaigning after just a little over a year's time of service. (<http://www.texastech.edu/stories/14-06-arrington-leaves-ttu-system-for-private-sector.php>). Finally, Mr. Arrington addressed his financial compensation from Scott Laboratories while he campaigns during an April 13, 2016 radio interview (transcription attached) on the "Chad Hasty Show" which broadcasts on AM-790 KFYO, Lubbock, Texas.

The Federal Election Campaign Act (the "Act") prohibits corporations from making any contribution or expenditure in connection with a federal election, including direct or indirect payment, distributions, or gifts of money to any candidate. 2 U.S.C. §§ 441b(a) and 441b(b)(2). The Act also prohibits the conversion of campaign funds to personal use. 2 U.S.C. §439a; 11 CFR 113.2(d). Finally, the Act also prohibits payment by a third person of a candidate's personal expenses. 11 CFR 113.1(g). These prohibitions are discussed in the Commission's Advisory Opinion 2000-001.

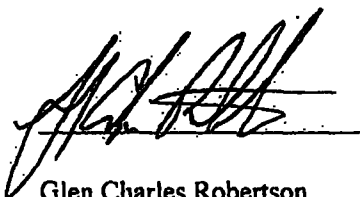
Because Mr. Arrington reports that he remains employed as president of Scott Laboratories, Inc., with a salary paid of \$188,330 through February 6, 2016 in his disclosure report filed with the Clerk of the House of Representatives, and it appears that he has been campaigning full-time since October 15, 2015, upon information and belief, it is probable that Mr. Arrington is being compensated with corporate funds, which would violate the Act in the manner outlined in the previous paragraph.

Mr. Arrington's contact information is below:

Jodey Cook Arrington
4407 13th Street
Lubbock, TX 79416

I respectfully request that your agency investigate this matter thoroughly:

Respectfully submitted,



Glen Charles Robertson
2602 Newcomb Ave.
Lubbock, Texas 79415

STATE OF TEXAS

§

COUNTY OF LUBBOCK §

BEFORE ME, the undersigned authority, personally appeared GLEN CHARLES ROBERTSON, a person identified to me by GLEN CHARLES ROBERTSON, who upon his/her oath, stated as follows:

“My name is Glen Charles Robertson,. I reside at 2602 Newcomb Avenue, Lubbock, Texas 79415. I am fully competent to make this affidavit. I have stated the facts in the foregoing complaint against Jodey Cook Arrington, and upon information and belief, the rational deduction from those facts and the documents referenced above it appears that Mr. Arrington is spending full-time campaigning, and yet still being apparently paid on a full-time basis from Scott Laboratories, Inc. Further, I certify that the documents attached hereto are, to the best of my knowledge, true and correct copies of the items they purport to be.”



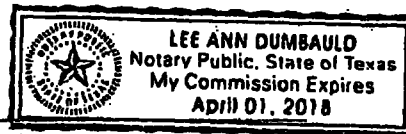
Glen Charles Robertson

SIGNED AND SWORN by the said GLEN CHARLES ROBERTSON, to certify which witness my hand and official seal of office on this 14th day of April, 2016.

Notary Public in and for the State of Texas



Lee Ann Dumbauld



Notary's Commission Expires

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EXCERPT FROM THE
CHAD HASTY SHOW
RADIO STATION KFYO AM-790
LUBBOCK, TX
APRIL 13, 2016 - 10:20AM
(Broadcast in progress)

MR. HASTY: KFYO, Jodey Arrington in studio, continuing on with our interview, candidate for Congress. Let's head to the phones. We will take just one more question from the phones and, Chad, you are on with Jodey Arrington.

CHAD: I was kind of curious, one of the things, I guess, I have been watching in this race is campaign contributions and how those are affecting kind of what we are getting back from candidates.

One of the things I notice is you are still a full-time, I guess, CEO for Scott Laboratories, Dr. Hickie, and you campaign full-time. How do you stay in FEC compliance running both of those at the same time, I guess?

MR. ARRINGTON: Okay, Chad, good question. I think I am -- Am I on? Okay.

Well, you know, I am blessed to have an employer that gives me the flexibility. I am still

1 engaged in my business, and, in fact, I had a meeting
2 the other day that -- I am in continual conversation
3 with Dr. Hickle, and before I did this I obviously had
4 to run it by my board. I had to run it by the chairman
5 and CEO, which is Dr. Hickle, and also the senior
6 leadership team at Grace Health System. I am at the
7 holding company, and everybody had to approve of it, and
8 I wasn't going to do it if they didn't.

9 And so they are supportive of me, and they
10 think I am the right guy for our district, I am the
11 right guy for the health care industry and for all the
12 things that matter to us in West Texas. So I am
13 grateful for that.

14 MR. HASTY: Thanks for the question.
15 appreciate it.

16 * * * * *